

State Water Resources Control Board

June 12, 2018

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7017 2680 0000 6195 8923

Ms. Karen Shelar
Environmental Health & Safety Specialist
Golden Gate Transit
1011 Andersen Drive
San Rafael, California 94901-5318
kshelar@goldengate.org

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT GOLDEN GATE TRANSIT, 1011 ANDERSEN DRIVE,
SAN RAFAEL**

Dear Ms. Shelar:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the UST at your facility on May 25, 2018, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Provide Valid Board of Equalization (BOE) Number – The BOE number in CERS is for a state facility; however, the tanks are owned and operated by the county.	All	May 25, 2018	Ongoing	H&SC 25286(c)(9)
2	Failure to Maintain Owner/Operator Agreement – The tank owner and tank operator are not the same, and the permit is issued to the facility owner. A written owner/operator agreement was not available in CERS or onsite at the time of the inspection.	All	May 25, 2018	Ongoing	H&SC 25284(a)(3); 23 CCR 2620(b)
3	Failure to Maintain Spill Containment Requirements – The spill containment devices contained liquid preventing their ability to hold five gallons.	All	May 25, 2018	Ongoing	23 CCR 2635(b)(1)

Office of Enforcement | 801 K Street, Suite 2300 | Sacramento, CA 95814 | 916.341.5272

FELICIA MARCUS, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

1001 I Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, CA 95812-0100 | www.waterboards.ca.gov

No.	Violation	Tank	Start Date	Stop Date	Regulation
4	Failure to Install Monitoring Equipment According to Manufacturer's Instructions – The Veeder Root automatic tank gauge wire was spliced and did not have an epoxy pack nor was the splice located within a waterproof electrical box. Veeder Root requires all splice/epoxy packs to be placed inside a waterproof electrical box when installing or replacing sensors.	Diesel #2	May 25, 2018	Ongoing	23 CCR 2638(a)
5	Failure to Monitor Product Piping – The sensor in the turbine sump was incorrectly positioned at an angle, and was also located on the wrong side of the sump preventing a leak from being detected at the earliest opportunity.	Diesel #1	May 25, 2018	Ongoing	23 CCR 2630(d)
6	Failure to Monitor Product Piping – The sensor in the turbine sump was incorrectly positioned at an angle and the secondary test boot was on with the Schrader valve pointing at 12 o'clock preventing a leak from being detected at the earliest opportunity.	Diesel #2	May 25, 2018	Ongoing	23 CCR 2630(d)
7	Failure to Monitor Product Piping – The sensor in the turbine sump was incorrectly positioned at an angle preventing a leak from being detected at the earliest opportunity.	Diesel #3	May 25, 2018	Ongoing	23 CCR 2630(d)
8	Failure to Maintain Monitoring or Testing Records Onsite – The 2016 and 2015 annual monitoring system certification records and the 2017 and 2014 secondary containment test records were not onsite at the time of inspection.	All	May 25, 2018	Ongoing	H&SC 25293; 23 CCR 2712(b)
9	Failure to Maintain Monitoring Plan Information – The pipe monitoring section in CERS incorrectly lists the monitoring panel and sensor model numbers and is missing the line leak detector manufacturer and model number.	All	May 25, 2018	Ongoing	H&SC 25286(a); CCR 23 2632(d)(1) and 2711(a)(9)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and Marin County Department of Public Works, Waste Management Division, within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated

operator report and any associated photos must be submitted as proof of compliance. In addition, please ensure that all liquids are removed from the submersible turbine sumps. Please monitor and maintain annular access boxes so that liquid observed in the annular space of diesel tank #2 in May 2015 and May 2017 does not occur again.

Please send all compliance documentation to the following:

State Water Board

Mr. Will Speth
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
will.speth@waterboards.ca.gov

Local CUPA

Ms. Julia Barnes, Supervisor
Waste Management Division
Marin County Department of Public Works
1600 Los Gamos Drive, Suite 210
San Rafael, California 94903
jbarnes@marincounty.org

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Ms. Julia Barnes
Supervising Hazardous Material Specialist
Marin County Department of Public Works
jbarnes@marincounty.org

Ms. Christie Coleman
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Mr. Keith Nunn
Chief Mechanic
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